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June 1, 1993

Mr. Jonathan Bernstein Assistant General Counsel Federal Election Commission Washington, DC 20463

RE: MUR 3774

Dear Mr. Bernstein:

Thank you for your letter of May 20 regarding the complaint filed by the Democratic Senatorial Campaign Committee alleging that the Christian Coalition may have violated the Federal Election Campaign Act (FECA) of 1971, as amended.

The Democratic Senatorial Campaign Committee's complaint against the Christian Coalition alleges that the Coalition was "active on behalf of [Paul] Coverdell in the run-off." This allegation is false.

The Christian Coalition played no role in the run-off whatsoever beyond the distribution of nonpartisan voter guides that informed voters on where both candidates stood on a broad range of issues, including income taxes, term limits, the death penalty, and support for a Balanced Budget Amendment. The voter guides made no endorsement, included a broad range of issues, and conveyed the stands of both candidates in an unbiased and fair manner. (See Exhibit 1)

The Federal Election Commission has stipulated that voter guides shall be considered nonpartisan if "the wording of questions presented does not suggest or favor any position on the issues covered." In addition, a voter guide is in compliance with FEC guidelines if it expresses "no editorial opinion concerning the issues presented nor does it indicate support for or opposition to any candidate or political party." [11 C.F.R., Section 114.4(b)(5)]

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The Christian Coalition voter guide in the U.S. Senate run-off in Georgia did not state, expressly or impliedly, support for or opposition to either candidate or political party. It fairly and accurately presented the views of both candidates without editorial comment or bias.

As even the Democratic Senatorial Campaign Committee complaint acknowledges, the Christian Coalition received no funding from the National Republican Senatorial Committee for printing the voter guides. It received no funding from the Coverdell campaign committee, and had no contact, coordination, or communication with the campaign other than that which was necessary for obtaining a response to our candidate questionnaire. Indeed, we are at a loss as to why the DSCC even included the Coalition with the other organizations mentioned in the complaint which apparently received funding from the Republican Party.

In conclusion, the Democratic Senatorial Campaign Committee's complaint is poorly researched and specious. We request that no action be taken against the Christian Coalition, and that this complaint be dismissed.

Sincerely,

Ralph/E. Reed, Jr. Executive Director

RR/psq

## Christian Coalion Voten Guide '92

GEORGIA RUNOFF ELECTION

	NOVEMBER 24		
e de la companion de la compan	U.S. S	enate	. E
	Wyche Fowler (D)	Paul Coverdali (R)	
SUPPORTS	Raising Inc	come Taxes	OPPOSES
SUPPORTS	Abortion on Demand (F	reedom Of Choice Act)	OPPOSES
OPPOSES	Choice in Educa	tion (Vouchers)	SUPPORTS
SUPPORTS	Homosext	ıal Rights	OPPOSES
OPPOSES	Tax-Funded		OPPOSES
SUPPORTS	Balanced Budg	et Amendment	SUPPORTS
SUPPORTS	Tax-Funding	of Abortion	OPPOSES
NO RESPONSE	Death I	Penalty	SUPPORTS
NO RESPONSE	Term l	Limits	SUPPORTS

## **Public Service Commissioner**

John Frank Collins (D)		Robert "Bobby" Baker, Jr. (R)
OPPOSES	Raising State Income Taxes	OPPOSES
SUPPORTS	Abortion on Demand (Freedom Of Choice Act)	OPPOSES
SUPPORTS	Choice in Education (Vouchers)	SUPPORTS
OPPOSES	Homosexual Rights	OPPOSES
OPPOSES	State-Sponsored Gambling	OPPOSES

<sup>\*</sup>Each candidate was sent an issues survey by fax or certified mail. Candidate receipt of the survey was verified by telephone call, postal receipt, or fax receipt. When possible, positions of candidates were verified or determined using voting records and/or public statements.

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